

2011-0328

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

:

Hon. *Claire C. Cecchi*.

v.

:

Criminal Number: 11- *791(ccc)*

KEVIN MCKNIGHT

:

Title 29, United States Code,
Section 501 (c)

I N F O R M A T I O N

(Embezzlement of Union Funds)

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

a. Local 1390 of the International United Transportation Union (hereinafter "Local 1390"), located at 523 Prospect Avenue, Laurence Harbor, New Jersey, was a "labor organization" within the meaning of the provisions of Title 29, United States Code, Sections 152(5), 402(i) and 402(j). It represented and admitted to membership persons who drove and maintained buses in New Jersey and elsewhere. Local 1390 had a general fund checking account at the Wachovia Bank.

b. Defendant KEVIN MCKNIGHT was elected as Secretary Treasurer of Local 1390 in or about January 2009. As such, he was a fiduciary who occupied a position of trust at Local 1390, pursuant to Title 29, United States Code, Section 501. The defendant was responsible for maintaining the Local's

financial books and records. He was also a signatory to the Local 1390 checking account.

The Embezzlement

2. From in or about January 2009 to in or about June 2010, in Hudson County, in the District of New Jersey and elsewhere, defendant

KEVIN McKNIGHT, while an officer of Local 1390, a labor organization engaged in an industry affecting commerce, knowingly embezzled, stole, and unlawfully and willfully abstracted and converted to his use and the use of others, money, funds and other assets, namely approximately \$68,000 of Local 1390 funds by making unauthorized withdrawals from the Local 1390 checking account.

In violation of Title 29, United States Code, Section 501(c).

A handwritten signature in cursive script, reading "Paul J. Fishman", written over a horizontal line.

PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 11-CR-791(CCC)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

KEVIN MCKNIGHT

INFORMATION FOR

TITLE 29 USC Section 501 (c)

PAUL J. FISHMAN

UNITED STATES ATTORNEY, NEWARK, NEW JERSEY

V. GRADY O'MALLEY

SENIOR LITIGATION COUNSEL

NEWARK, NEW JERSEY

973-645-2725